

Abenicio Cisneros [SBN 302765]
2443 Fillmore St. #380-7379
San Francisco, CA 94115
707-653-0438
acisneros@capublicrecordslaw.com

Attorney for ADRIAN RISKIN

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

ADRIAN RISKIN

Petitioner,

vs.

LARCHMONT VILLAGE PROPERTY
OWNERS ASSOCIATION

Respondent.

) Case No.: BS172934

) **DECLARATION OF ADRIAN RISKIN IN**
) **SUPPORT OF VERIFIED PETITION FOR**
) **WRIT OF MANDATE UNDER THE**
) **CALIFORNIA PUBLIC RECORDS ACT**

) **[Gov't Code § 6250, et seq. Civ. Proc. Code §**
) **1085, et seq.]**

) **DATE: May 16, 2018**

) **TIME: 1:30 P.M.**

) **DEPT: 83**

) **JUDGE: Hon. Mary H. Strobel**
)

I, Adrian Riskin, declare under oath as follows:

1. I am an open records activist who uses open government laws to investigate and understand the activities of Business Improvement Districts, the City of Los Angeles, and the relationship between the two. I publish my findings through blogging and community events. My research has been featured as part of an exhibit at the Los Angeles Poverty Department Museum and documentary filmmakers have used records I have received to inform production of a film on the Greater West Hollywood Food Coalition and the Hollywood Media District BID.

2. I submitted California Public Records Act ("CPRA") requests to Respondent the

1 Larchmont Village Property Owners Association ("Respondent" or "the BID") on April 16, 2017
2 ("Request 1"), April 17, 2017 ("Request 2"), and May 2, 2017 ("Request 3"). True and accurate
3 copies of the requests are included as Exhibit A.

4 3. I sent follow-up communications to my requests on April 28, 2017, May 2, 2017,
5 May 11, 2017, May 30, 2017, and February 17, 2018. True and accurate copies of those emails are
6 included as Exhibit B.

7 4. The only response I received to any of these follow-up communications was a May
8 16, 2017, email in which the BID stated it was reviewing the request and would respond further in
9 14 days. A true and accurate copy of the BID's May 16, 2017, email is attached as Exhibit C.

10 5. At no time prior to filing the petition did the BID provide a determination of
11 disclosability, confirm the existence of records, or provide an estimated date of production. Prior to
12 litigation, the BID did not produce a single record in response to Requests 1, 2, and 3.

13 6. The BID's post-litigation production of records on September 14, 2018, contained a
14 December 2016 email exchange responsive to Request 1.1, and agendas to three BID board
15 meetings—the meetings on May 22, 2014; May 18, 2016; and May 24, 2018—responsive to Request
16 2.2. The BID had never previously produced these records to me.

17 7. The BID's post-litigation production of records on November 5, 2018 contained a
18 contract responsive to Request 1.3. The BID had never previously produced that record to me.

19
20 I declare under the penalty of perjury under the laws of the state of California that the foregoing is
21 true and correct.

22 DATED: March 13, 2019
23
24
25

26 _____
27 ADRIAN RISKIN
28 Petitioner